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Attorneys for Plaintiffs
HAKAN YUCESOY, ABDI MAHAMMED,
MOKHTAR TALHA, BRIAN MORRIS, and
PEDRO SANCHEZ

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

HAKAN YUCESOY, ABDI MAHAMMED,
MOKHTAR TALHA, BRIAN MORRIS, and
PEDRO SANCHEZ, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC. and TRAVIS
KALANICK,

Defendants.

CASE NO. 3:15-cv-00262-EMC

**STIPULATION AND ~~[PROPOSED]~~ ORDER
TO EXPEDITE DISCOVERY**

Date: November 24, 2015
Time: 1:30 p.m.
Place: Courtroom 5
Judge: Hon. Edward M. Chen

STIPULATION

Pursuant to Civil Local Rule 7-12, the undersigned counsel of record for Plaintiffs Hakan Yucesoy, Abdi Mahammed, Mokhtar Talha, Brian Morris, and Pedro Sanchez (“Plaintiffs”) and Defendants Uber Technologies, Inc. and Travis Kalanick (“Defendants”) (collectively, the “Parties”) stipulate and agree as follows:

WHEREAS, the Court granted the Parties’ stipulation that the deposition of Plaintiff Yucesoy shall take place on January 8, 2016, in San Francisco, CA, *see* Dkt. 126;

WHEREAS, the Court ordered the Parties to “meet and confer and to submit to the Court a stipulation regarding expedited discovery” in advance of Mr. Yucesoy’s deposition, *see* Dkt. 125 at 2;

WHEREAS, the pleadings may not be settled in advance of the January 8, 2016 deposition of Mr. Yucesoy;

WHEREAS, in order to complete “expedited discovery before Mr. Yucesoy’s deposition takes place” in light of the Court’s order that “Defendants shall depose Mr. Yucesoy on all issues” but that “Mr. Yucesoy may be subject to recall if reasonably necessary” (Dkt. 374), the Parties are agreed that (1) Defendants may propound discovery on Mr. Yucesoy on or before November 20, 2015, based on the allegations in the Second Amended Complaint even though some of the claims in the Second Amended Complaint have been dismissed, and Plaintiffs will respond to any such discovery within fourteen days of service; and (2) Defendants may serve additional discovery on Mr. Yucesoy within seven days after Plaintiffs file their Third Amended Complaint, and Plaintiffs will respond to any such discovery within fourteen days of service.

IT IS HEREBY STIPULATED AND AGREED, subject to the Court’s approval, that:

(1) Defendants may propound discovery on Mr. Yucesoy based on the allegations in the Second Amended Complaint by November 20, 2015, and Plaintiffs will respond to any such discovery within fourteen (14) days of service; and

(2) Defendants may propound additional discovery on Mr. Yucesoy within seven (7) days after Plaintiffs file their Third Amended Complaint, and Plaintiffs will respond to any such discovery within fourteen (14) days of service.

1 **IT IS SO STIPULATED**

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3 Dated: November 17, 2015

GIBSON, DUNN & CRUTCHER LLP

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5 By: /s/ Theane D. Evangelis
Theane D. Evangelis

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7 Attorneys for Defendants UBER
TECHNOLOGIES, INC. and TRAVIS
8 KALANICK

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10 Dated: November 17, 2015

LICHTEN & LISS-RIORDAN, P.C.

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12 By: /s/ Shannon Liss-Riordan
Shannon Liss-Riordan

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14 Attorney for Plaintiffs HAKAN YUCESOIY, ABDI
MAHAMMED, MOKHTAR TALHA, BRIAN
15 MORRIS, and PEDRO SANCHEZ

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19 ~~[PROPOSED]~~ ORDER

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21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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23 Dated: 11/20, 2015



ECF ATTESTATION

I, Dhananjay S. Manthripragada, hereby attest that concurrence in the filing of this document has been obtained from Theane D. Evangelis and Shannon Liss-Riordan.

By: /s/ Dhananjay S. Manthripragada
Dhananjay S. Manthripragada